

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No: 08 CR 487
)	
v.)	
)	Judge Elaine E. Bucklo,
JESUS GONZALEZ,)	
)	
Defendant.)	

AGREED MOTION TO AUTHORIZE OUT-OF-STATE TRAVEL

NOW COMES the Defendant, Jesus Gonzalez, by undersigned counsel and seeks an Order of this Court authorizing enlargement of the current conditions of bond to permit out-of-State travel. In support thereof, the Defendant states the following:

1. Defendant is charged in the above captioned cause.
2. Defendant is currently on bond.
3. Defendant was previously authorized by this Court to travel to-and-from Peoria, Illinois to attend court in the District Court for the Central District of Illinois as well as to travel to Texas previously for family events.
4. Defendant again seeks to travel to Texas over the Thanksgiving holiday for a family gathering with his wife and children. Additionally, Defendant's mother will be traveling to Texas from Mexico and Defendant's mother's condition prevents her from

further travel to Illinois.

5. Defendant seeks authorization of this Court to leave the Northern District of Illinois on November 21, 2014 and return on November 30, 2014.

6. Pre-trial Officer Sabina Hutado advised that Defendant is and has been in complete compliance with all conditions of pre-trial release and has no objection to the grant of this motion.

7. AUSA Chris Hotaling has advised that he has no objection to the grant of this motion.

WHEREFORE, the Defendant seeks authorization from this Court to travel to Texas during the dates of November 21, 2014 to November 30, 2014.

Stephen E. Eberhardt
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Stephen E. Eberhardt, an Attorney, certify that on October 30, 2014, I served the attached document on the below listed parties pursuant to Fed.R.Crim.P.49, Fed.R.Civ.P 5, L.R. 5.5, and the General Order on Electronic Filing of the United States District Court for the Northern District of Illinois, Eastern Division.

/s/ Stephen E. Eberhardt
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